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> Hearing Date and Time: October 27, 2011 at 10:00 a.m. (ET) Response Deadline: October 13, 2011 at 4:00 p.m. (ET)

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Chapter 11 Case No. In re

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

Debtors. (Jointly Administered)

RESPONSE OF MITSUI SECURITIES CO., LTD. TO DEBTORS' 188TH OBJECTION TO CLAIMS, WITH RESPECT TO CLAIM NO. 62852

Mitsui Securities Co., Ltd. ("Mitsui") by its undersigned counsel, as and for its response (the "Response") to the Debtors' objection (the "Objection") to Mitsui's Claim No. 62852 (the "Mitsui Claim") respectfully represents as follows:

- 1. Mitsui filed the Mitsui Claim based upon its ownership interest in two notes recognized by the Debtors as among the so called "Lehman Program Securities." In the Mitsui Claim, Mitsui set forth the International Securities Identification Numbers of the notes, and its interest in each of the notes, but stated that it did not know the blocking numbers because the custodian, Lehman Brothers International Europe ("LBIE") refused to disclose blocking numbers to Mitsui or other similarly situated note holders.
- 2. Thereafter LBIE, as custodian, filed a comprehensive proof of claim, designated as Claim No. 62783, which included the same interest in these notes that Mitsui claimed, and LBIE disclosed therein the relevant blocking numbers as 6045568 and 6045671, (together

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amounting to a claim of \$2,574,325.76, and comprising the "Claim in Question"). Since filing

Claim No. 62783, LBIE transferred the Claim in Question to Lehman Brothers Japan, Inc.

("LBJ") and LBJ has since transferred all right, title and interest in the Claim in Ouestion to

Mitsui. Accordingly, Mitsui should be recognized as the rightful holder of the Claim in Question

by virtue of this transfer. A copy of the transfer of claim to Mitsui, designated Docket Number

19986, is annexed hereto as Exhibit A.

3. In their Objection, the Debtors seek to disallow the Mitsui Claim on the grounds

that it is duplicative of the corresponding portion of LBIE's Claim No. 62783, which the Debtors

reference in the Objection as having been transferred to LBJ. Because it now holds the Claim in

Question, Mitsui does not oppose such relief, provided the Debtors recognize Mitsui as the

rightful holder of the Claim in Question, through the transfer of claim process referred to above.

4. Either way, whether through allowance of the Mitsui Claim or allowance of the

Claim in Question, Mitsui respectfully submits that it should be deemed by the Debtors and this

Court as the rightful holder of the claim reflected in such proofs of claim;

WHEREFORE, Mitsui respectfully requests entry of an order consistent with this

Response and such other and further relief as is just and proper.

Dated: October 13, 2011

New York, New York

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